

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF K.B.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, K.B., declare as follows:

2 1. I am competent to testify as to the matters herein, and make this declaration based
3 on my personal knowledge.

4 2. I am 16 years old. I live in Spokane, Washington with my mother and older
5 brother. My father also lives in Spokane.

6 3. I am choosing to remain anonymous and use initials to identify myself in this
7 declaration because of safety fears and the desire to protect myself and my family.

8 4. My family and I can't personally pursue an individual lawsuit against the Federal
9 Government because the costs that would involve are out of reach for us.

10 5. I am transgender and agender. In my case, being transgender means that I do not
11 identify with the gender I was assigned at birth (female) and have sought to socially and
12 medically transition. Being agender means that I don't identify with any specifically labelled
13 gender. My pronouns are they/them.

14 6. Ever since the idea of gender became a fleshed-out concept for me, I knew I was
15 different. When I was around six years old, I started to see differences in how I was treated in
16 juxtaposition with my male cousins and my older brother. I felt uncomfortable being grouped by
17 gender, or being subjected to the expectations for behavior and outward presentation for either
18 boys or girls. In hindsight, I now recognize that I was experiencing gender dysphoria.

19 7. I was able to talk about my sexual identity before I knew how to talk about my
20 gender identity. One day I came home from kindergarten and told my mom that I liked girls. My
21 mom and I are very close. She is asexual, and is comfortable talking about complex gender and
22 sexuality issues. At the time, she explained to me, in terms that made sense to a six-year-old, the
23 spectrum of gender and of sexuality. She was accepting of who I am, and never pushed a
24 particular gender or sexual identity on me.

25 8. The earliest form of gender-affirming care I remember receiving was a haircut at
26 the age of six. I wanted to cut my hair very short, but even something that simple took time. We

1 had to go to two or three different places before we found one that would actually cut my hair
2 the way I wanted. The other places refused because what I was asking for wasn't a "girl's
3 haircut."

4 9. Growing up I liked to use different names and pretend to be different characters.
5 They were most frequently male characters or characters without a clear gender. When I was
6 around 11, I finally found a word to describe what I was feeling and who I was: agender. That's
7 when I came out as agender and started using they/them pronouns. I first came out to friends,
8 and then to my family. For the most part, they were all very accepting.

9 10. When puberty hit, I started to feel very anxious about the physical changes I was
10 experiencing. Socially, I noticed people started treating me differently. I was frequently
11 misgendered and was questioned a lot. I felt "othered" and isolated. It affected my mental health
12 greatly.

13 11. I've been in and out of talk therapy since I was about six, prompted initially by
14 my parent's divorce. I was diagnosed with depression at the age of eight, and with anxiety when
15 I was 11. Around age 11, I started going to therapy more regularly and talking about gender
16 issues. I consider talk therapy to be a part of my gender-affirming care.

17 12. My parents were included in some of the therapy sessions where I worked on
18 issues related to gender. My parents were well aware of what I was going through. My therapist
19 provided a diagnosis of gender dysphoria in early 2023.

20 13. Starting in sixth grade, I transferred to an online school. It was a supportive
21 bubble that took me through the pandemic years. My school community was very understanding
22 and supportive of my gender identity.

23 14. In my high school years when I returned to an in-person school, I experienced
24 some challenges. For the most part, people have been pretty accepting, but there are still
25 occasionally some issues with misgendering. My freshman year of high school things were pretty
26

1 bad. Even though my school is supportive, there was a difference between how people perceived
2 me and how I perceived myself.

3 15. I have known that I wanted to go on HRT, Hormone Replacement Therapy, ever
4 since first I became aware it was an option, around age 11. At that point I spent time online
5 researching HRT and speaking with my doctor and therapists off and on about potential options.
6 I also spoke with a classmate who had been prescribed HRT through a gender clinic in Western
7 Washington and I asked him about the process of going on HRT. In 2023, with the letter from
8 my therapist attesting to my gender dysphoria diagnosis, I was able to pursue hormone therapy
9 through that same gender clinic.

10 16. I've been on testosterone since mid-July 2024. It was a very lengthy process to
11 reach that point. In order to even be prescribed testosterone I had to spend time on a waiting list
12 in order to complete a series of appointments with social workers, doctors, and my parents. The
13 first appointment was with a social worker, where we discussed my mental health, general well-
14 being, and the reasons I wanted to seek medical gender-affirming care. Later, there was another
15 appointment with my mom, myself and the doctors to discuss options. There was an appointment
16 with both my parents and I where we discussed with my doctor the risks and benefits of HRT
17 and the doctor sought both of my parents' consent for my treatment. In the final appointment,
18 they showed me how to do the injections and finally prescribed me the testosterone. I now pick
19 up my testosterone prescription every month, and I have follow-up appointments every three
20 months, as well as bloodwork and hormone level checks.

21 17. I have been taking testosterone for nearly eight months now. I started on a low
22 dose because I wasn't interested in fully transitioning to present as male. Since then, I've slowly
23 increased the dose. My voice has become slightly lower, and I have increased muscle mass. HRT
24 has helped me so much with my depression and anxiety. I feel more like myself than I ever have.
25 I have a very supportive friend group at school, who see me as who I am regardless of HRT, but
26

1 outside of that, people are able to see me more as who I am now as well. They are seeing me as
2 how I feel on the inside.

3 18. In addition to medical forms of gender affirming care, in 2021 I also changed my
4 name. I have gone through the process of legally changing my gender marker and name.

5 19. I understand that last month, President Trump issued an Executive Order that
6 would ban gender-affirming care for anyone under the age of 19. If this Executive Order is
7 implemented, it would be devastating for me. My mental and physical health would suffer
8 greatly. The effects would be felt almost immediately.

9 20. I perform weekly injections of testosterone. If my prescription were denied, I
10 would feel mental and physical effects within two to three days of missing a dose. Physically,
11 there would be sudden changes in my energy levels. I deal with chronic fatigue and taking
12 testosterone has helped a lot with that. I notice that I feel a lot more sluggish and run down when
13 I get towards the end of the week just before I take my next dose. Today I am very physically
14 active. For example, I like to work out at the gym. Ending testosterone completely would
15 severely degrade my ability to conduct normal activity, especially exercise.

16 21. HRT is also an essential tool for my mental health. It helps keep me safe from
17 anxiety and depression. I don't think that many people fully understand just how hard it is to not
18 feel at one with your own body. The worst times with my gender dysphoria were quite dark.
19 Since going on testosterone, my emotions and my mental health have been far more regulated.
20 In part this is the emotional impact of simply having access to the hormone and the option of
21 taking it. I feel secure and safe knowing that my transition is in progress. Without access to
22 gender-affirming care and HRT, I would feel like all the work I've done, the time I spent waiting,
23 and the growth I've accomplished would have been for nothing. It would be like reaching this
24 amazing thing, a physical presentation that matches who I am inside, only to have it taken from
25 me.
26

1 22. I also worry about what would happen if I wasn't able to talk about gender-related
2 issues in therapy. It's unlikely that therapy would have the same benefit for me if my therapist
3 wasn't allowed to talk about everything that was affecting me. For example, if my therapist
4 refused or was prohibited from affirming my agender identity, or using my correct pronouns and
5 name, I would stop going.

6 23. Further, I hope to have surgical gender-affirming care (top-surgery) before age
7 19. The financial aspect of it would need to be figured out, but the Executive Order would
8 eliminate the possibility completely.

9 24. I have friends who are currently on the waiting list to receive gender-affirming
10 care. Essentially, they've been waiting for this treatment for most of their lives. I know people
11 who aren't out as transgender to their parents and are waiting until they're 18 years old to seek
12 care, just so they can remain safe. The Executive Order harms them, too. They are frightened
13 that the potential of a safe and healthy future could be taken away from them so quickly and
14 easily.

15 25. The Executive Order also harms parents, because it threatens their right to make
16 healthcare decisions in consultation with their children's doctor. Parents may even feel
17 threatened with criminal prosecution if they support gender affirming care for their kids. In my
18 case, even if my dad doesn't fully understand what it is like to be genderqueer or identify as
19 agender, he is supportive of my gender identity. I remember when I was seeking HRT and his
20 participation in my care was essential and required, and there were times I worried that he
21 wouldn't be able to attend an appointment with me. That stress was very hard for me to deal
22 with. I felt intense worry all the way up to the day of the appointment. If the Executive Order
23 prevented my dad from being involved in my healthcare—even threatening him with criminal
24 liability—that would harm both of us severely.

25 26. It frustrates me that many people misunderstand gender identity, including
26 preferred names and pronouns, as a personal choice. If you look at my medical charts dating

1 back to when I was six years old, it is very well documented that I am genderqueer. I am agender,
2 it is simply who I am. If anyone thinks this identity is something I have consciously chosen, they
3 are wrong. To be able to live life as myself, I need gender-affirming care.

4 I declare under penalty of perjury under the laws of the State of Washington and the
5 United States of America that the foregoing is true and correct.

6 DATED this _____ day of February 2025, at Spokane, Washington.

7
8 _____
K.B., Agender Youth

9
10 _____
N.B., Parent of K.B.

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4 I declare under penalty of perjury under the laws of the State of Washington and the
5 United States of America that the foregoing is true and correct.

6 DATED this 12 day of February 2025, at Spokane, Washington.

7 K.B.
8 K.B., Agender Youth

9 N.B.
10 N.B., Parent of K.B.